

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
RENEWABLE OPERATING PERMIT APPLICATION  
STAFF REPORT

January 23, 1998

Facility

Rainbow Coatings, Inc.  
25460 Novi Road  
Novi, Michigan 48375

*Comments -  
discussed on 4/1/98  
moving record keeping  
from A*

Purpose

Major stationary sources of air pollutants are required to obtain and operate in compliance with a Renewable Operating (RO) permit pursuant to Title V of the Federal Clean Air Act of 1990 and Michigan's administrative rules for air pollution control pursuant to Section 5c(1) of Article II, Chapter I, Part 55 of P.A. 451 of 1994. Major stationary sources are defined by criteria in administrative rule R 336.1211(1). The RO permit is intended to simplify and clarify a facility's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This report, as required by R 336.1214(2), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the applicable requirements, an explanation of any equivalent requirements included in the draft permit pursuant to R 336.1210(14), and any determination made pursuant to R 336.1213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

General Information

Facility Mailing Address:	25460 Novi Road, Novi, Michigan 48375
Source Registration Number (SRN):	N0086
Standard Industrial Classification Code (SIC)	3479
# of Facility Sections:	1
Application #:	199600114
Responsible Official:	Mr. Frederick Leek, President 248-449-6600
AQD Permit Contact Person:	Mr. Iranna Konanahalli, Environmental Engineer 734-953-1428
Date Permit Application Submitted:	July 31, 1996
Date Application Administratively Complete:	July 31, 1996
Is Application Shield in Effect?:	Yes
Date Public Comment Begins:	February 17, 1998
Deadline for Public Comment:	March 19, 1998

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### Source Description

The facility is located in Oakland County. It is located south of Grand River Road, I-96 and on east side of Novi Road. The facility is a jobshop engaged in coating predominantly aluminum architectural parts with high performance coatings. The coating operations are the source of the volatile organic compounds (VOC) emissions.

The following tables lists facility wide emission information as estimated for 1996.

#### **TOTAL FACILITY EMISSIONS-Criteria Pollutants**

Pollutant	Tons per Year
Volatile Organic Compounds	22

#### **TOTAL FACILITY EMISSIONS-Hazardous Air Pollutants (HAPS)\*\***

Pollutant	Tons per Year
Dimethyl Phthalate (131-11-3)	5.11
Methyl Isobutyl Ketone (aka Hexone) (108-10-1)	7.29
Toluene (108-88-3)	21.76
Xylene, Isomers and Mixtures (1330-20-7)	8.23
Diethylene Glycol Butyl Ether (112-34-5)	1.980
Ethyl Benzene (100-41-4)	1.33
Methyl Ethyl Ketone (aka MEK or 2-Butanone) (78-93-3)	5.69
Ethylene Glycol Monobutyl Ether (111-76-2)	6.47
Total Hazardous Air Pollutants (HAPs)	63*

\*\*As listed pursuant to Section 112(b) of the Clean Air Act

\*Based upon concentration ranges in MSDS; the maximum of the range is chosen; based upon 1994 EI year emissions.

See Sections C & D in the attached draft RO Permit for summary tables of all processes at the facility that are subject to process-specific emission limits or standards in any applicable requirement.

### Regulatory Analysis

The facility is located in Oakland County which is currently designated as attainment/unclassified for all criteria pollutants. The source is not subject to R336.1220 for Major Offset Sources. The facility is not subject to

Prevention of Significant Deterioration (PSD) (40 CFR 52.21) regulations. The facility is considered a major source of hazardous air pollutant emissions because the potential emissions of any single hazardous air pollutant regulated by the Clean Air Act, Section 112 is greater than 10 tons per year and the potential emissions of all hazardous air pollutants combined are greater than 25 tons per year.

The facility has three emission units or process groups: 1) a liquid paint line consisting of six booths with a dry filter system in each booth and two ovens; 2) a powder coating line consisting of a powder booth, a cyclone and a cartridge filters; 3) a rack burnoff oven with a thermal incinerator. The liquid paint line is subject to the Rule 336.1621 (the Rule 621) as revised by the site-specific SIP revision (Federal Register: February 21, 1996, Vol. 61, No. 35). The site-specific SIP revision is codified in 40 CFR, Part 52. The revision allows the facility to emit volatile organic compounds (VOC) up to 6.5 pounds of VOC per gallon of coating, minus water, as applied when the coating used meets Architectural Aluminum Manufacturers Association (AAMA) extreme performance specification number 605. All other coatings used must comply with the Rule 621. The powder coating line and the rack burnoff oven must comply with the opacity rule R336.1301.

Please refer to Section E and Section F in the attached draft permit for detailed regulatory citations for each Emission Unit at the facility. Section A contains regulatory citations for General Conditions.

#### **Equivalent Requirements:**

This permit does not include any equivalent requirements or significant changes pursuant to R 336.1212(6). Equivalent requirements are enforceable applicable requirements that are equivalent to the applicable requirements contained in the original New Source Review permit or Consent Order/Judgment.

#### **Non-applicable Requirements:**

Section G of the draft RO permit lists requirements that are **not** applicable to this source as determined by DEQ-AQD, if any were proposed in the application. These determinations are incorporated into the permit shield provision set forth in Part A (conditions 33 through 36) of the draft RO permit pursuant to R 336.1213(6)(a)(ii).

#### **Processes in Application Not Identified in Draft RO Permit**

There were no processes listed in the RO permit application as exempt devices under R 336.1212(3). Exempt devices are not subject to any process-specific emission limits or standards in any applicable requirement.

#### **Draft RO Permit Terms/Conditions Not Agreed to by Applicant**

This permit does not contain any terms and/or conditions that the DEQ-AQD and the applicant did not agree upon pursuant to R 336.1214(2). If the person and the DEQ-AQD cannot agree upon terms and conditions of a draft RO permit, the terms and conditions that the DEQ-AQD believes are necessary to comply with the requirements of R 336.1213 shall be incorporated into the RO permit.

#### **Facility Compliance Status**

The DEQ-AQD finds that the facility is expected to be in compliance with all applicable requirements as of the date of issuance of this RO permit.

### Preliminary Findings

The Department of Environmental Quality, Air Quality Division (DEQ-AQD) has made a preliminary determination for approval of the draft RO permit No. 199600114, subject to the terms and conditions outlined in the draft permit. A final decision on the RO permit will not be made until the public has had an opportunity to comment on the DEQ-AQD's preliminary determination and draft permit. In addition, the United States Environmental Protection Agency (EPA) is allowed up to 45 days to review the draft permit and related material.

The DEQ-AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for DEQ-AQD is the Southeast Michigan District Supervisor. The final determination for RO permit approval/disapproval will be based on the contents of the permit application, a judgment that the facility will be able to comply with applicable emission limits and other requirements, and resolution of any objections by the United States Environmental Protection Agency.

E 1.1

Refer to Appendix 8 or other? → Refer to Appendix 4/5  
diluent? misspelling 5

E 1.2 misspelling - powered booth

E 1.3 limit for temperature